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16 **UNITED STATES DISTRICT COURT**
17 **CENTRAL DISTRICT OF CALIFORNIA**

18 ORANGE COUNTY
19 COASTKEEPER, a California non-
20 profit corporation,

21 Plaintiff,

22 v.

23 ALLOY DIE CASTING CO., a
24 corporation,

25 Defendant.

Case No. 8:22-cv-01072-FWS-JDE

**REQUEST FOR ENTRY OF
CONSENT DECREE**

Honorable Fred W. Slaughter

26 On November 22, 2022, Plaintiff Orange County Coastkeeper sent a letter to
27 the United States Department of Justice and the United States Environmental
28 Protection Agency to trigger a mandatory 45-day review period to review the

1 [Proposed] Consent Decree entered into by the parties on November 21, 2022. *See* 33
2 U.S.C. § 1365(c); 40 C.F.R. § 135.5. On January 5, 2023, the Department of Justice
3 sent the parties a letter indicating that the federal agencies had no objection to entry of
4 the [Proposed] Consent Decree. That letter is attached hereto as Exhibit 1.
5 Accordingly, the Parties hereby respectfully request that the Court enter the
6 [Proposed] Consent Decree filed with the Court contemporaneously with this request.
7

8 Respectfully submitted,
9

10 Dated: January 9, 2023

LOZEAU DRURY LLP

12 /s/ Douglas J. Chermak

13 Douglas J. Chermak

14 *Attorneys for Plaintiff* ORANGE COUNTY
COASTKEEPER

16 Dated: January 9, 2023

SHOOK HARDY & BACON LLP

18 /s/ Jad T. Davis

(as authorized on 1/9/23)

19 Jad T. Davis

20 *Attorneys for Defendant* ALLOY DIE
21 CASTING CO.
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